

MKB:EG/NMA
F.#2006R02288

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

MOHAMMAD AKRAM KHAN and
SAJID JAVED,

Defendants.

- - - - -X

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 08-041 (S-1) (SJ)
(T. 15, U.S.C., § 1644(a); T.
18, U.S.C., §§ 1029(a)(2),
1029(a)(3), 1029(b)(2),
1029(c)(1)(A)(i), 2 and 3551
et seq.)

RECEIVED
U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

THE GRAND JURY CHARGES:

* MAY 12 2008 *

COUNT ONE BROOKLYN OFFICE
(Fraudulent Use of Credit Cards)

1. In or about and between February 2000 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, did knowingly and intentionally use fraudulently obtained credit cards to obtain money, goods, services and things of value, which within a one-year period had a value aggregating \$1,000 or more, in transactions affecting interstate commerce.

(Title 15, United States Code, Section 1644(a); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWO
(Conspiracy to Use Unauthorized Access Devices)

2. In or about and between February 2000 and December 2007, both dates being approximate and inclusive, within the

Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, did knowingly and with intent to defraud conspire to use one or more unauthorized access devices, to wit: credit cards, during a one-year period, and by such conduct did obtain things of value aggregating \$1,000 or more during that period, in a manner affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a) (2).

3. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, committed and caused the commission of, among others, the following:

OVERT ACTS

(a) On or about November 25, 2005, the defendant MOHAMMAD AKRAM KHAN applied for a private mailbox at a Commercial Mail Receiving Agency at 980 4th Avenue, Brooklyn, New York.

(b) On or about May 31, 2006, the defendant MOHAMMAD AKRAM KHAN applied for a private mailbox at a Commercial Mail Receiving Agency at 3062 Steinway Street, Astoria, New York.

(c) On or about October 24, 2006, the defendant SAJID JAVED went to a Commercial Mail Receiving Agency at 2071 Flatbush Avenue to pick up mail from three separate private mailboxes.

(d) On or about February 1, 2007, the defendant MOHAMMAD AKRAM KHAN deposited \$1,400 at a branch of Washington Mutual Bank, located at 130 2nd Avenue, New York, New York, into a bank account in the name of "Majahide A. Zia," a fraudulent identity created by a co-conspirator.

(e) On or about February 21, 2007, the defendant SAJID JAVED withdrew \$520 from a bank account in the name of "Ahmed S. Iviano" at a branch of Chase located at 1663 East 17th Street, Brooklyn, New York.

(f) On or about February 27, 2007, the defendant SAJID JAVED deposited \$6,000 into an account in the name of "Adin Azia" at a branch of Chase located at 1663 East 16th Street, Brooklyn, New York.

(g) On or about February 27, 2007, the defendant SAJID JAVED made a payment of \$40 for a Chase credit card in the name of "Shakil Mian" at a branch of Chase located at 1663 East 16th Street, Brooklyn, New York.

(h) On or about August 25, 2007, the defendant MOHAMMAD AKRAM KHAN picked up several pieces of mail from three separate private mailboxes at a Commercial Mail Receiving Agency at 3062 Steinway Street, Astoria, New York.

(Title 18, United States Code, Sections 1029(b) (2), 1029(c) (1) (A) (i) and 3551 et seq.)

COUNT THREE

(Use of Unauthorized Access Devices)

4. In or about and between February 2000 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, did knowingly and with intent to defraud use one or more unauthorized access devices, to wit: credit cards, during a one-year period, and by such conduct did obtain things of value aggregating \$1,000 or more during that period, in a manner affecting interstate commerce.

(Title 18, United States Code, Sections 1029(a)(2), 1029(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT FOUR

(Conspiracy to Possess Unauthorized Access Devices)

5. In or about and between February 2000 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, did knowingly and with intent to defraud conspire to possess fifteen or more unauthorized access devices, to wit: credit cards, in a manner affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

6. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere,

the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, committed and caused the commission of, among others, the following:

OVERT ACTS

(a) On or about November 25, 2005, the defendant MOHAMMAD AKRAM KHAN applied for a private mailbox at a Commercial Mail Receiving Agency at 980 4th Avenue, Brooklyn, New York.

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(e) On or about February 21, 2007, the defendant SAJID JAVED withdrew \$520 from a bank account in the name of "Ahmed S. Iviano" at a branch of Chase located at 1663 East 17th Street, Brooklyn, New York.

(f) On or about February 27, 2007, the defendant SAJID JAVED deposited \$6,000 into an account in the name of "Adin Azia" at a branch of Chase located at 1663 East 16th Street, Brooklyn, New York.

(g) On or about February 27, 2007, the defendant SAJID JAVED made a payment of \$40 for a Chase credit card in the name of "Shakil Mian" at a branch of Chase located at 1663 East 16th Street, Brooklyn, New York.

(h) On or about August 25, 2007, the defendant MOHAMMAD AKRAM KHAN picked up several pieces of mail from three separate private mailboxes at a Commercial Mail Receiving Agency at 3062 Steinway Street, Astoria, New York.

(Title 18, United States Code, Sections 1029(b)(2), 1029(c)(1)(A)(i) and 3551 et seq.)

COUNT FIVE

(Possession of Unauthorized Access Devices)

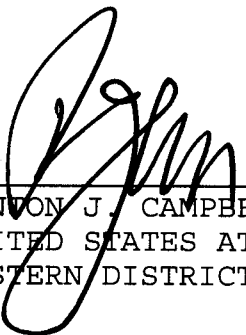
7. In or about and between February 2000 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MOHAMMAD AKRAM KHAN and SAJID JAVED, together with others, did knowingly and with intent to defraud possess fifteen or more

unauthorized access devices, to wit: credit cards, in a manner affecting interstate commerce.

(Title 18, United States Code, Sections 1029(a)(3), 1029(c)(1)(A)(i), 2 and 3551 et seq.)

A TRUE BILL


FOREPERSON


BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

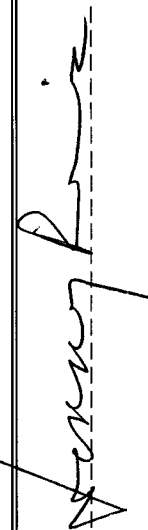
vs.

SAJID JAVED and
MOHAMMAD AKRAM KHAN,
Defendants.

INDICTMENT

(T. 15, U.S.C., § 1644(a); T. 18, U.S.C., §§ 1029(a)(2), 1029(a)(3),
1029(b)(2), 1029(c)(1)(A)(i), 2 and 3551 et seq.)

A true bill.


Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Elizabeth Geddes, Assistant U.S. Attorney (718-254-6430)

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

1. Title of Case: **United States v. Sajid Javed et al.**

2. Related Magistrate Docket Number(s): 07-M-1079

None (X)

3. Arrest Date: December 20, 2007 (Javed) and April 19, 2008 (Khan)

4. Nature of offense(s): ☒ Felony

☐ Misdemeanor

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
★ MAY 12 2008 ★

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the
Local E.D.N.Y. Division of Business Rules):

BROOKLYN OFFICE

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()

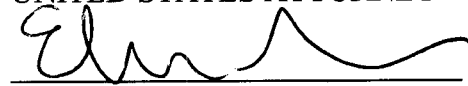
7. County in which crime was allegedly committed: Brooklyn
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Has this indictment/information been ordered sealed? () Yes (X) No

9. Have arrest warrants been ordered? () Yes (X) No

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

By:



Elizabeth Geddes
Assistant U.S. Attorney
718-254-6430